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June 20, 2011

MEMO ENDORSED

Via Email

Honorable Richard J. Sullivan United States District Judge United States Courthouse 500 Pearl St. New York, NY 10007

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Re: Vancil v. Sugarman, et al., Civil Action No. 10-CV-4312

Dear Judge Sullivan:

Counsel for the parties in this matter jointly submit this letter in connection with the Court's June 13, 2011 Order directing the parties to submit a proposed protective order no later than June 20, 2011. Despite the best efforts of all counsel, work and vacation schedules have prevented the parties from reaching agreement on the language of an agreed proposed protective order. All parties are confident they can do so within the next few days, however, and so respectfully request an extension of three days, to June 23, 2011, to submit their agreed proposed protective order. The parties do not believe this brief extension will necessitate the modification of any other deadlines established in the Court's June 13, 2011 order.

Respectfully submitted,

David H. Kistenbroker

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